ID: CCA_2010020309141526 Number: **201011019** Release Date: 3/19/2010

Office:

UILC: 6501.01-03

From:

Sent: Wednesday, February 03, 2010 9:14:52 AM

To: Cc:

Subject: RE: penalties

That is correct. Think of 6501(k) as a soak up of the remaining refund after we have recovered anything under 6501(h) related to the NOL carryback.